

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

COMMAND MANAGEMENT SERVICES,)	
INC., an Oregon corporation,)	
)	
Plaintiff,)	
)	Case No.: 2007 – C – 7017
vs.)	
)	
WYNDHAM HOTELS AND RESORTS,)	
LLC, a Delaware limited liability company,)	
WYNDHAM HOTEL MANAGEMENT INC.,)	
a Delaware corporation, WYNDHAM)	
WORLDWIDE OPERATIONS, INC., a)	
Delaware corporation, MEHP O'HARE, LLC,)	
a Delaware limited liability company, MEHP)	
O'HARE MANAGEMENT, INC., a Delaware)	
corporation, and WYNDHAM O'HARE,)	
)	
Defendants.)	

AGREED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendants, MEHP O'HARE, LLC, a Delaware limited liability company, and MEHP O'HARE MANAGEMENT, INC., a Delaware corporation, by and through their attorneys, Reno & Zahm LLP, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby moves this Court for an order allowing it an additional twenty-eight (28) days to respond to the Complaint in this matter, and in support thereof, states as follows:

1. The Complaint was filed on December 13, 2007.
2. The Defendants were served on December 18, 2007, and therefore, the Defendants are required to file an answer or other responsive pleading on or before January 7, 2008.
3. Counsel for the Defendants was recently engaged to serve as defense counsel in this matter.

4. Counsel for the Defendants is in need of additional time to review the allegations set forth in the Complaint and formulate a response thereto.

5. Accordingly, the Defendants seek an extension of twenty-eight (28) days, to and including, February 4, 2008, to file an answer or other responsive pleading to the Complaint.

6. Counsel for the Defendants has not previously sought an enlargement of time to answer or otherwise plead to the Complaint in this case, and makes this initial request based on a *bona fide* need for additional time.

7. This request is made in good faith and will not prejudice the Plaintiff.

8. Counsel for the parties have conferred, and Plaintiff's counsel has no objection to this motion.

WHEREFORE, Defendants, MEHP O'HARE, LLC, a Delaware limited liability company, and MEHP O'HARE MANAGEMENT, INC., a Delaware corporation, respectfully request that this Court enter an order granting an extension to and including February 4, 2008, within which to answer or other responsive pleading may be filed.

Dated this 4th day of January, 2008.

Defendants, MEHP O'HARE, LLC, a Delaware limited liability company, and MEHP O'HARE MANAGEMENT, INC., a Delaware corporation, by their attorneys, Reno & Zahm LLP

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